

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CROWN CLOTHING CORPORATION,
Plaintiff,

v.

CIVIL ACTION NO. 05-10049 (NG)

RANDCORE, INC., RAND INTERNATIONAL
TRADING, INC., ANDRE BERNARD, AND
RONALD BERNARD,
Defendants.

**MOTION OF THE PLAINTIFF CROWN CLOTHING CORPORATION
FOR THE ENTRY OF AN ORDER REGARDING DISCOVERY AND
FOR SEPARATE AND FINAL JUDGMENT**

The plaintiff Crown Clothing Corporation (“Crown Clothing”) moves that this Court enter the Order and the Separate and Final Judgment as agreed to by the plaintiff Crown Clothing and the defendants Andre Bernard, Randcore, Inc. (“Randcore”) and Rand International Trading, Inc. (“Rand”) (collectively the “Defendants”) in the Agreement for Separate And Final Judgment filed herewith. In support of this motion Crown Clothing states the following:

1. The Defendants have agreed to the entry of the Order and the Separate And Final Judgment as recited in the Agreement for Separate And Final Judgment filed herewith (the “Agreement”).

2. The defendant Ronald Bernard has not assented to the entry of the Order and the Separate And Final Judgment against the Defendants as set forth in the Agreement notwithstanding communications between Gary R. Greenberg, counsel for Ronald Bernard, and counsel for Crown Clothing and the Defendants requesting the same. Because Ronald

Bernard has not assented to the entry of the Order and the Separate And Final Judgment Crown Clothing had to file this motion.

WHEREFORE, Crown Clothing Corporation requests that this court enter the Order and the Separate and Final Judgment as agreed to by the plaintiff Crown Clothing Corporation and the Defendants Andre Bernard, Randcore, Inc. and Rand International Trading, Inc. in the Agreement for Separate And Final Judgment filed herewith.

Respectfully submitted,

CROWN CLOTHING CORPORATION

By its attorneys,

/ s / John C. Wyman

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